

# **WORKFORCE INVESTMENT ACT**

## **INDIVIDUAL TRAINING ACCOUNT MANAGEMENT**

### **BOSTON BEST PRACTICES GUIDE**

## ORGANIZATION OF THE GUIDE

Boston decided to take a “best practices” approach to developing the processes required to ensure effective, user-friendly, non-duplicative referral and documentation practices in implementing the policies of Boston’s Workforce Investment Board and Workforce Investment Area agency with respect to the provisions of the Workforce Investment Act of 1998. Representatives of Boston’s three One-Stop Career Centers, the Job Training Alliance and other community based training providers, the Mayor’s Office of Jobs & Community Services and the Boston Private Industry Council, (Boston’s Workforce Investment Board) began meeting in May 2000. Having agreed to the principles and definitions that would guide practice (Section I) and agreeing to the central role of a “best practices” approach (Section II), the “Best Practices Work Group” (BPWG) designed a work flow (Section III) with accompanying documentation that would ensure that appropriate customers could access training funds through an Individual Training Account (ITA) whether their first contact with the workforce development system was with any approved service provider or One-Stop Career Center in Boston (Section IV). The procedures for certifying customer eligibility for ITAs are described in Section V, “Intensive and Training Services under WIA.” ***Boston will also use applicable policies and procedures in this Guide for National Emergency Grants (NEG) and other initiatives that use ITAs as a service delivery mechanism.***

The **Customer Portfolio Summary (CPS)** serves as summary<sup>1</sup> level documentation of the provision of core and intensive services (i.e., the application of the procedures described in Section V of this guide). It was developed by the BPWG and is provided, along with its instructions, as a separate stand-alone package to allow revisions as needed to meet customer need and evolving policies. The CPS together with the information in the automated Massachusetts One Stop Employment System (MOSES) is the case management record for all ITA customers.

In addition to the Sections enumerated above, this Best Practices Guide provides Attachments that:

1. Summarize the policy decisions of the Workforce Board and approved by the committees of the Board that impact the practices recommended by the Best Practices Work Group;
2. Enumerate the options for assessing and verifying information collected on the CPS;
3. Summarize the Student Performance Levels (SPL) yielded by assessments of English Speakers of Other Languages (ESOL) to enable staff of career centers and training providers to interpret such results and make appropriate referrals. Please note that Attachment 3 is a highly abbreviated version of SPL’s. More detailed documents are available.
4. Outline Boston’s “Documenting Service Delivery” Policy
5. Define Boston’s “Follow-up Services Policy;”
6. Delineate Boston’s “Monitoring Policy;”
7. Provide the NEG Principals

Documents that are available but not in this Guide are:

1. Boston One Stop Career Centers’ hours of operation, and membership processes;
2. Quarterly schedules of WIA/Training Information Sessions at each of the career centers;
3. Names and contact information for the lead training staff members at each career centers;
4. A list of documents needed to assess eligibility and appropriateness for Workforce Investment Act training funds that are updated and issued throughout the year as such information changes.
5. WIA Fact Sheet

The BPWG meets throughout the year to continuously review and improve these processes. It makes recommendations to the Workforce Advisory Group (WAG), comprised of representatives of the major stakeholders in the Boston workforce development and labor exchange systems, including WIA mandated partners. The WAG advises the Employment & Training Systems Committee of the Workforce Investment Board.

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<sup>1</sup> The CPS serves as a comprehensive summary of case materials including work history, assessment instruments, etc. included in the customer’s portfolio file.

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# BOSTON BEST PRACTICES GUIDE

## MANAGEMENT OF INDIVIDUAL TRAINING ACCOUNTS (ITA) under the WORKFORCE INVESTMENT ACT

### I. WIA Principles & Definitions

#### A. WIA legislation emphasizes seven central principles:

1. **Streamlining** services and information to participants through a One-Stop delivery system
2. **Empowering individuals** to obtain needed services to enhance their employment opportunities
3. **Ensuring universal access** to core employment-related services
4. **Increasing accountability** of States, localities and training providers for performance outcomes
5. **Establishing a stronger role** for Local Boards and the private sector
6. **Providing increased State and local flexibility** to implement innovative and comprehensive workforce investment systems
7. **Improving youth programs** through services which emphasize academic and occupational learning

The USDOL Overview of WIA (September, 1998, page 1) clearly articulates the importance of local control, employer involvement, customer service and customer choice:

“Title I of the legislation is based on the following elements:

- Training and employment programs must be designed and managed at the local level – where the needs of businesses and individuals are best understood.
- Customers must be able to conveniently access the employment, education, training, and information services they need at a single location in their neighborhoods.
- Customers should have choices in deciding the training program that best fits their needs and the organizations that will provide that service. They should have control over their own career development.
- Customers have a right to information about how well training providers succeed in preparing people for jobs. Training providers will provide information on their success rates.
- Businesses will provide information, leadership and play an active role in ensuring that the system prepares people for current and future jobs.”

## **B. Local Principles**

Boston implementation incorporates and expands upon the WIA principles.

### **1. No Wrong Door: We are a workforce development and labor exchange system**

Boston is committed to continuing direct customer access to community based training providers. This requires increased administrative and programmatic coordination between training providers and the one-stop career centers.

### **2. Variation in practice is inherent in a diversified system responsive to customer needs**

Continuing direct customer access to community based training providers creates a range of options for initial system contact and means that there will be a variety of practices by individual organizations across the system.

### **3. Multi-Methodological Approach**

Boston's training and education providers have a long history of delivering quality services to customers/participants. Over the course of this history, organizations have used standardized instruments and/or developed customized approaches to assessment with various populations, as appropriate. A Best Practices approach to assessment and program development respects this diversity among providers.

### **4. Customer Service & Process Improvement: Streamline services/reduce duplication**

Information gathered at any point in the customer's engagement with the system should be passed along to the next person/organization in the system that will provide service to the customer.

### **5. Informed Customer Choice**

Customers, having been provided information on their training options, and understanding the performance history of training providers and total service package (ancillary services), are the ultimate decisionmakers regarding choice of training program. Staff may indicate their concurrence or disagreement with a customer's choice, but "informed customer choice" prevails in the selection of a training provider.

### **6. Best Practices**

Best Practices is the vehicle for setting standards based on quality of practice that incorporates variation of practice, multi-methodological approaches and customer choice. Best Practices is a continuous improvement process.

## C. Definitions

**Core services:** involve the provision of labor market information, initial assessment of skills and needs, job search and placement assistance, information about and referral to supportive services and follow-up services after placement. Any job seeker may access core services in the One-Stop Career Center system.

**Dislocated Worker:** An individual who has been terminated or laid off, or who has received a notice of termination or layoff, from employment, is eligible for or has exhausted entitlement to unemployment compensation; or has been employed for a duration sufficient to demonstrate to the appropriate entity at a One-Stop Career Center attachment to the workforce but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that was not covered under a state unemployment compensation law.

**Intensive services:** involve more comprehensive assessments, development of individual employment plans, group and/or individual counseling, case management and short-term pre-vocational services. Job seekers must register, and have their eligibility determined in order to receive intensive services.

**Individual Training Account (ITA):** For adult and dislocated worker training, ITAs are the vouchers issued to customers for use at approved training providers. *ITAs are the vehicle that enables training vendors to receive payment for their services.*

**Training services:** include occupational skills training, job readiness training, skill upgrading; and also, adult education and literacy activities provided in conjunction with other skills training. Training services are available only to eligible customers who are still unable to find jobs after receiving intensive services.

**Transferable skills:** refers to skills that, while they may not *precisely* match the skill requirements of a specific job, provide sufficient competence in the basic tasks of the work that the person is likely to be able to perform the job. For example, a person may have never worked as a meeting scheduler; however, s/he may have run a household in which s/he scheduled appointments for other household members.

**Unemployed:** An individual who is without a job and who wants and is available for work.

## II. Why a “Best Practices Guide?”

The Workforce Investment Act requires that eligibility for a training ITA be based on an individual’s inability to be employed without additional training. Lack of employability must be established using a “core” and an “intensive” service as defined by the Act. In addition, the Boston Workforce Board has established that residents of Boston who are low-income individuals and/or working poor constitute a “priority population” for the use of ITAs as defined by the Workforce Investment Act. This does not make this group an exclusive population, but it does mean that individuals with these characteristics are given priority for the use of limited funds. Individuals without these characteristics may also apply for an ITA when there are unusual or compelling circumstances.

WIA establishes One Stop Career Centers as a primary system entry point for assessing and documenting that an individual needs training to become employed. Career centers deliver the core and intensive activities that assess this need. As a result, eligibility and assessment activities conducted solely by training providers prior to the Workforce Investment Act now must be delivered in conjunction with the One-Stop Career Centers. The decision about which entity, the One-Stop Career Center or the training provider, should deliver which elements of an assessment to establish an individual’s need for training becomes a decision based on collaboration between training providers and One-Stop Career Centers. The decision making process must have as its outcomes: 1) the conclusion that an individual cannot become employed without training; 2) choice of a training area/field and 3) selection of a training provider. However, the process steps required to produce this outcome depend upon:

- how the individual enters the workforce development system (through initial contact with a training provider, through initial contact with a career center or some other way),
- the specific assessment activities that have been conducted with that individual at the point of contact with the system,
- the role of specific assessment activities in the decision making process of each organization.<sup>2</sup>

In this Guide an individual assessment of employability is defined by a process that clearly articulates a number of key questions. These questions are captured in the Customer Portfolio Summary form. However, decisions regarding the selection of tools that are valid and appropriate to provide the answers to these questions are left to the practitioner based on standards of quality developed by a Best Practices process. (For examples, see Attachment 2, “Menu of options for verifying information collected on Customer Portfolio Summary.”)

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<sup>2</sup> For example, many training programs *at the outset of contact* with a potential program participant conduct in-depth interviews and interest inventories as part of their assessment of an individual’s appropriateness for the program. These activities are among the “intensive” services career centers are mandated to provide under WIA. Training programs that continue to deliver these services under WIA need to be clear about the reason and cost-benefit of this investment of resources.

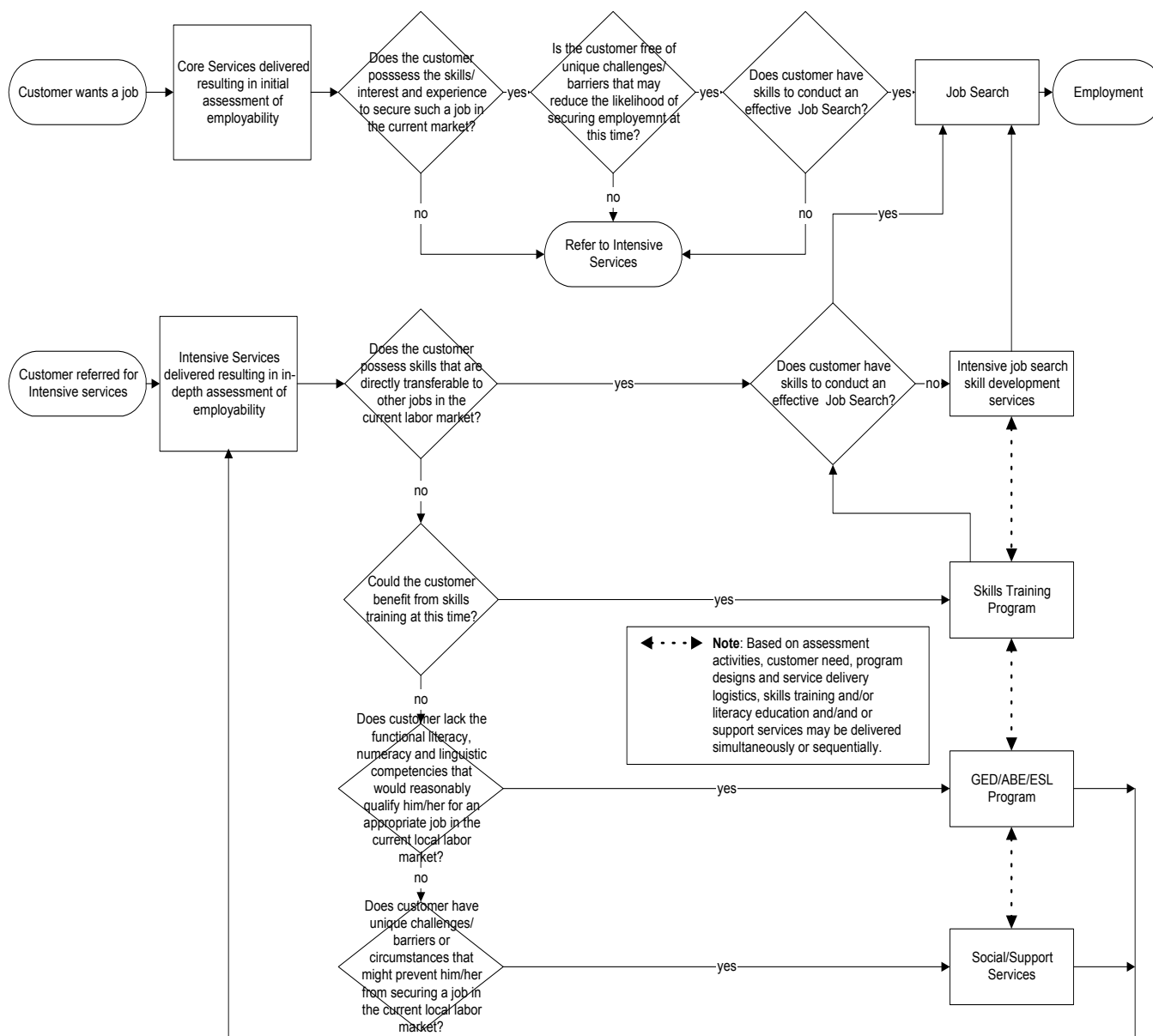
This guide is based on a series of discussions, meetings and recommendations of a Best Practices Work Group representing training providers and career centers that built on the work of an ITA Subgroup of the Management Task Force (as of 01/01, the “Workforce Advisory Group”). The Best Practices Work Group will continue to meet, as needed, to ensure that the processes involved in the issuing of ITAs in Boston represent the highest standards of quality, customer service and user-friendliness while meeting the administrative, legal and regulatory requirements of the Workforce Investment Act. The Workforce Advisory Group may adjourn and reconvene the Best Practices Work Group as needed.

### **III. WIA ITA Process Overview**

The delivery of “core services” will result in an initial appraisal of an individual’s employability. The only outcomes of the delivery of core services are 1) engagement in job search or 2) engagement in activities that comprise “intensive services.” The possible outcomes of the appraisal of an individual’s employability that may result from the delivery of “intensive services” are referrals to: 1) job search skills development; 2) a program of job skills training; 3) a program to develop educational/literacy/linguistic competency (GED, ABE, ESL); 4) programs providing social support (counseling, mental health, domestic violence, etc.)



### WIA ITA Process Flowchart



#### IV. Career Center/Provider Referral Processes: Two Way Flow

Potential customers/participants in training programs may enter the workforce development system by first coming to a training provider or by first coming to a career center. In cases where either organization (career center or training provider) conducts activities with a job and/or training seeker that result in a direct referral to the other entity, these activities will be documented on a “Customer Portfolio Summary” and will initiate the creation of a file or “portfolio” that will be added to and will follow the customer, as appropriate, through the

workforce development and labor exchange system. Material will be added to the “Portfolio” based on the best practices and needs of the organizations that engage with the customer.

## **V. Intensive and Training Services under WIA**

The process of pursuing intensive and training services involves the coordination of the customer expressing her/his goals, the career counselor guiding the customer through a process of assessments and evaluations yielding information that will help determine training appropriateness. This process will allow Jobs and Community Services (JCS) staff to certify eligibility. The following are the steps that career center staffs and their job seeking customers must take to pursue intensive and training services under WIA. This is meant as an outline of the basic steps; more detailed information about forms and procedures are available from the Mayor’s Office of Jobs & Community Services.

### **A. Training Approval Process**

#### **Summary**

In order to successfully be approved for training under WIA, a customer must be approved in the following series of steps:

- 1) **Initial Assessment** indicates a need for additional or intensive services to secure viable employment
- 2) **In-depth Employability Assessment** indicates that the customer:
  - a) is appropriate for training
  - b) does not have other barriers in their life that would either prohibit them from successfully completing training or to secure a viable job once training was completed; and
  - c) is eligible for WIA services under Title 1A or ID; and
- 3) **Certification of Training program:** the customer chooses a program approved as eligible for ITA funding under WIA in Boston

#### **Detailed Description of Steps in Training Approval Process**

##### **1. Initial Assessment**

Customers can begin pursuit of WIA services, including training, at one of the career centers, at any Training Service Provider/Vendor, or through the State’s Rapid Response system. While career centers are responsible for the submission of a completed CPS to JCS for certification of training, intake and assessment activities may be initiated at any approved training vendor. In order to reduce duplication of effort and to provide quality customer service, training providers/vendors that conduct intake and assessment activities are expected to document these activities in the CPS and forward it to the Career Center.

Basic information about a customer is gathered through use of a questionnaire and/or interview. Information should include residency information, level of income, US citizenship and selective service status, a work history review, an education review, and identification of unique characteristics. An employability review for intensive or training services will include more than one of the following: a basic skill review, comparison of skills to employment options, failed job search or job acquisition activity, and special barrier considerations. The process of assessment is integrated with the review of eligibility and appropriateness for training (see section below).

The pursuit of training is one of four options available to a customer as a result of an initial employability assessment at the career center that determines that the customer cannot secure a viable job in the current market without intensive services. Other options include job search skills development through the Career Center or a program to develop basic educational, literacy or linguistic skills (GED, ABE, and ESL), and social support (counseling, mental health support, etc.) available by referral. Occupational skills training is available to Boston job seeking customers under WIA. The training process offers training to those customers who most need these services in order to secure employment or improved earnings. Training is available in the form of individual training accounts in a system designed to offer customers information on program performance and quality while being fully informed about their range of options for training. The four options may or may not be mutually exclusive. For example, a customer could be involved in training and social service support at the same time. However, the actual menu of service would be determined on a case by case basis.

## **2. In-Depth Employability Assessment**

### **a. Appropriateness for Training**

In order to be eligible for training, a customer must be deemed appropriate for training by JCS. In order for JCS to make an informed decision, the following is required: a Customer Portfolio Summary (CPS), documentation in the Massachusetts One-Stop Employment System (MOSES) case management tool, a current resume, and any other relevant information. Appropriateness for training is documented on the CPS, and should include information that establishes that an individual:

- i. lack skills for employment that make occupational training necessary to secure a reasonable job; and
- ii. that their life situation enables them to reasonably enroll in and complete training in the time period identified; and
- iii. has not completed an occupational skills training program in the past 12 months

The CPS is a summary of assessment and work experience information to be used by Career Centers and training vendors to facilitate the referral process. Career Center staff will utilize MOSES, the Commonwealth's automated system, to input required WIA information (see E. Tracking and Documentation, below). Additional labor market and training research information will be kept in customer case folders.

### **b. Ability to Make Use of Training**

The career center counselor must confirm that the customer has no outstanding barriers that would prohibit him/her from successful completion of a training program or from finding viable employment upon completion. Such barriers might include: substance abuse, extreme family obligations, serious physical or mental health problems, domestic abuse, homelessness, etc.

### **c. Eligibility for Training**

In order to be eligible for Title IA intensive or training services, a participant must:

- i. be a Boston resident
- ii. meet current income eligibility guidelines<sup>3</sup>

In order to be eligible for Title ID intensive or training services, a participant must:

- i. be a Boston resident or dislocated from a company in Boston<sup>4</sup>
- ii. meet the aforementioned definition of a dislocated worker

## **3. Certification of Training Program**

The customer seeking training, with assistance of the career center, must be able to document that the training provider's program is approved under the Boston qualifications policy and procedures. The particular program must be on the Boston Master Agreement training vendor list which is a subset of the Commonwealth's WIA training vendor list.

JCS is responsible for the review and approval of all ITA agreements. The average planned ITA cost is approximately \$5,000. While there is no ITA financial cap, any proposed ITA over \$8,000 will require a secondary review. An informed customer will be able to select an approved training program in Boston, but other factors like cost, training schedule, available support services, and placement assistance may be considered during the approval process.

A complete payment plan must be in place so that if the customer is required to pay for a portion of the training cost, the sum of the contribution authorized by JCS plus any additional costs must be covered. (For example, if an approved course costs \$9,500 and an ITA is approved for \$8,000 by JCS, the customer must have a reasonable plan to cover the \$1,500 balance).

The customer seeking training must also establish a realistic job goal that is supported with labor market information. For a WIA ITA to be approved there must be substantial evidence of labor market demand and the customer's job goal needs to be realistic/attainable.

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<sup>3</sup> 175% of the 70% Lower Living Standard Income Level for individuals and families

<sup>4</sup> The requirement that the training seeking customer be dislocated from a job in Boston may be waived on a case by case basis when an employer that is headquartered in Boston, but has offices in other regions, requests that employees of its firm who reside outside of Boston receive services from a Boston Career Center.

## B. Priority Populations

Boston has identified the following characteristics to help identify barriers and prioritize those individuals most in need of training:

1. An English reading and computing achievement at less than a 9<sup>th</sup> grade level. Since the best predictor of labor market success in the Boston market is educational achievement, persons who have attained advanced educational levels such as four year college degrees will not meet this priority, unless there are unusual and compelling circumstances. Unusual and compelling circumstances for training might include, for example: higher education that is outdated, educational credentials that include non-English language degrees, or education in a field that has been rendered obsolete by technological or economic changes in the labor market.
2. Employed, but earning less than 175% of the 70% Lower Living Standard Income Level for the Boston metropolitan area.
3. Lack of a good work history, with extensive periods of unemployment or underemployment, or of non-participation in the labor market.
4. A history of involvement with the courts that affects employability.
5. Dislocated workers living or previously working in Boston unable to gain employment at a wage similar to previous job. Due to overwhelming demand for services, Title 1D eligibility will be limited to those who:
  - a. received notice of separation within previous 12 months
  - b. were actually separated within previous 12 months
  - c. were determined eligible for unemployment within previous 12 months
6. Other identifiable or self-disclosed barriers to employment including a disability.

Customers are not required to submit proof of priority status. **WIA and NEG customers will be required to submit eligibility documentation, depending on the specific grant and the requisite eligibility criteria, which will include proof of U.S. citizenship or documented immigrant status, age, family income, dislocated worker and selective service status.**<sup>5</sup>

## C. TRAINING OF LAST RESORT

Because of the limited nature of WIA funds, customers are required to access and use other available funds for training before utilizing WIA funds.

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<sup>5</sup> The requirement for the inclusion of documentation of citizenship or immigrant status, and selective service status in a customer's file (as opposed to self-attestation of same) was initiated in May 2001. The requirement for documentation of dislocated worker status was initiated in October of 2001. The requirement for documentation of individual customer income was initiated in July 2003. The requirement of documentation for family income was initiated in January 2004. All these decisions to collect documentation were made by JCS in agreement with the Commonwealth Corporation and DCS.

The Boston Workforce Development system is organized to provide simple and direct access to necessary services for both job seekers and employers. As an integral part of the system, the operation of the Individual Training Accounts (ITA) should also be as straightforward as possible. The purpose of this statement is to clarify the funding process that should be used to assist customers in achieving their training goals.

A customer who is eligible for training may be given an ITA using WIA funds, if such funds are available, under the following circumstances:

- 1.) The Customer has applied for other forms of assistance as may be appropriate, and
  - a) has been determined ineligible, or
  - b) has been approved for an insufficient amount, (WIA funds may be used for the balance remaining after other funds are applied) or
  - c) a determination is pending. (Reimbursement to WIA funds must be made if the customer is subsequently eligible for a Pell grant.)
- 2.) The Customer is not eligible to have training in the appropriate occupational areas paid for through Trade, the Employment Services Program (ESP) of the Department of Transitional Assistance, the Youth Opportunity Grant (YOG) Program, or Empowerment Zone or other such funding source.
- 3.) The Customer is eligible for support through ESP, EZ, or other such funding source, but the amount of the support is insufficient to pay for the full cost of the training, in which case WIA funds may be used for the balance remaining after other funds have been applied.

#### **D. Adult Basic Education, English as a Second Language, and Combined Training Programs**

Given the need to target the uses of available funds, Boston WIA Title I funds may only be used for training that has job placement and/or job readiness as one of its primary objectives and purposes of its design. Programs whose primary purpose is development of basic reading, writing or math skills are not eligible for these funds unless they meet the requirements and apply to become an approved vendor. Career Center customers have access to WIA Title II funded programs which provide adult basic education classes in GED and ESL.

#### **E. Tracking and Documentation**

##### **1. Documentation**

The Customer Portfolio Summary and the MOSES Case Management Plan documents the necessary information discussed above and is the formal documents that enable JCS to approve training requests.<sup>6</sup> Training requests may be denied if the information is not completed, and may

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<sup>6</sup> Boston Career Centers will continue to use a modified CPS and Commonwealth's MOSES database to process and track WIA and NEG customers. Boston began using the new MOSES Case Management Tool for NEG customers on

also be denied if they are submitted less than 2 weeks prior to the training start date. Such requests are too late to complete the necessary transactions and contracts between JCS and the training provider prior to the start date of training. JCS reserves the right to reject requests based on the completeness, quality or timeliness of submissions.

## **2. Case Management Services/Activities and Documentation Requirements**

Each of Boston's career centers is responsible for ensuring the delivery of case management services including assessment, counseling, referral, job search, job placement and follow-up. The majority of training vendors represented on Boston's Master Agreement include job placement services as part of the training package. Though career centers are ultimately responsible, in these instances, the training vendor is expected to job place the customer. Vendors can also choose to work in unison with the referring career center on placement activities. In the case where a training vendor does not offer placement services, the career center is fully responsible.

In order to ensure the quality of service and documentation of outcomes, at a minimum, the following 13 events and activities must be tracked and recorded. Career centers are responsible for obtaining information related to the activities and data entry of items 1 – 5. They are responsible for data entry of items 6 – 13 when the customer or the training provider provides the information.<sup>7</sup> Training providers are expected, as a condition of funding under ITAs, to provide the referring Career Center with information on program entry, training progress and job placement. A training agency's failure to provide required information may result in their de-certification as a training provider.

1. Initial intake
2. Assessment
3. Eligibility determination
4. Research and selection of training
5. Referral to training
6. Training start
7. Trainee Progress Reports
8. Training drop-outs
9. Training completion
10. Job search/job development activities
11. Entered employment; basic placement information (employer, wage, hours, job title, benefits)
12. Confirmation of employment
13. Retention information following three quarters after individual placement.

Information will be recorded using the MOSES system, which is described below. Career Center staff will document the process of all WIA and NEG customers as per Boston's "WIA

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January 30, 2004.

<sup>7</sup> Career Centers are responsible for obtaining information related to the activities and data entry of items 1-3 and 10-13 for intensive services only customers.

Documenting Service Delivery” which includes regular submission of Trainee Progress Reports (TPRs).

### **3. National Emergency Grants**

Boston Career Centers will provide reemployment services to NEG customers in accordance with the DCS NEG Principles 03-29 (Attachment #7). The Principles require that NEG Projects provide value-added, accelerated, timely, specialized, individualized services to grant customers. To accomplish this, the NEG project must provide the appropriate location, staff and resources for participants and be recognizable to the customer. NEG funds are discretionary funds provided for the purpose of providing a higher intensity of services to specific populations than would be available through formula funds.

### **4. MIS System**

Boston Career Centers are responsible for transmitting information and conducting customer tracking through MOSES as per the EDIC in agreement with the Career Centers. Career Centers must be able to electronically submit all individual participant and activity information to the Commonwealth so it can electronically transmit all required aggregate data to funding sources in a timely manner. Career Centers are also expected to receive, transmit and document the receipt of Trainee Progress Reports from training vendors.

## **F. Outcomes**

All WIA and NEG customers are expected to secure unsubsidized employment. Upon completion of training Working Poor customers are expected to achieve one of the following outcomes:

- Job with a new employer
- Raise in pay with the present employer
- Increased responsibilities with the present employer

## **G. Support Services**

Boston will limit the allocation of WIA support services funds to MBTA passes for Title IA customers. Career Center case management staff will determine the distribution of passes on a case by case basis.

## **H. Follow Up Services**

All WIA and NEG customers will be offered follow up services for up to 12 months after placement. Please see the JCS Follow Up Policy. (Attachment #5)

## **I. Monitoring**



JCS will formally monitor the delivery of WIA and NEG services by the Boston Career Centers and selected training providers on an annual basis. In addition to these visits JCS will conduct periodic reviews of service and expenditure levels and determine if there is any need for technical assistance. Please see the JCS Monitoring Policy. (Attachment #6)

## **J. Rapid Response**

JCS and the Boston Career Centers will continue to work closely with the DCS Rapid Response Team. Please see the NEG Principals. (Attachment #7)

## **K. Grievance Procedures**

Boston Career Centers will comply with their respective One Stop Career Center Operator grievance policy. This policy and JCS Grievance and EEO policies must be posted in public areas within each Career Center. All WIA and NEG customers are made aware of grievance and EEO policies during the Career Center Orientation activity.

## **L. Wage Verification**

JCS will verify 10% of the WIA Title I Adult and Dislocated placements quarterly through a random selection process. The information that will be verified will be placement wage, start date, job title, full-time/part-time status, benefits, and employer information. Employers will be asked to verify wages through phone calls or by written communication. A release statement signed within the CPS will accompany any written communication. This release will give permission for the information to be shared with JCS, PIC, and other appropriate oversight agencies.

### **Boston Self-Sufficiency Policy**

The vast majority of dislocated workers who seek WIA Title I services are unemployed, but for those who are employed, they must comply with the Boston's Self-Sufficiency Policy. In order to be eligible for WIA Title I services in the City of Boston, employed dislocated workers must meet the following self-sufficiency standards:

For workers who were dislocated at a wage of \$10 per hour less, present wages must be no more than 91% of the previous wage. For workers who were dislocated at a wage of more than \$10 per hour, present wages must be no more than 80% of the previous wage.

Dislocated workers who earned more than \$80,000 per year are excluded from consideration.

## ATTACHMENT 1

### SUMMARY OF POLICY DECISIONS BY BOSTON'S WORKFORCE BOARD THAT IMPACT THE DETERMINATION OF ELIGIBILITY FOR ITAs

Date of Vote	Text of Vote	Background for and Implication of Vote
12/10/99	<b>Proportional Support:</b> The Board approves the principle of proportional support in the form of funding in the Memorandum of Understanding that will be negotiated with one stop partners under the Workforce Investment Act.	<p>The Workforce Investment Act (hereinafter "the Act" or "WIA") requires that Local Workforce Boards negotiate Memorandum of Understanding (MOU) with "mandatory one stop partners." The one stop partner, after signing the MOU, is entitled to a seat on the Workforce Board. "Proportional support" means that the partner should pay for the share of the costs of providing core services proportionate to the share that their customers are of the total universe of job seeker customers. In order to continue the competitive model, the MOU must specify that proportional support for core operations be made in the form of funds, rather than agency staff, space or other resources.</p> <p>Section 121(c) of the Act and sections 20 CFR Parts 662.70 and 662.300(b) are the statutory and regulatory references, respectively.</p>
2/3/00	<b>Limited Funds:</b> The Board finds that funds available for training under the Workforce Investment Act are limited, and accordingly, recommends that a priority be established for low income customers, including those who are the "working poor", and directs the staff to develop specific guidelines for both economically disadvantaged customers and for dislocated workers to assist Career Center staff and training vendors to target training services to such customers	<p>Under section 134(d)(4)(E) of the Act, the Board is authorized to establish a priority for serving public assistance and other low income individuals if the funds allocated to the local area are limited.</p> <p>Since funding is generally limited, as acknowledged in section 20 CFR 663.600(b) of the regulations, priority <b>must</b> be given to recipients of public assistance or other low income persons, as determined by the local area in accordance with sections 20 CFR Parts 663.600(c) and 663.600(d).</p>
2/3/00	<p><b>Principles governing the selection of training vendors:</b> The following principles are the governing policy for the selection of vendors to be approved to receive the Individual Training Accounts:</p> <p>1.) Those vendors must demonstrate the achievement of a minimum of a 60% placement rate for the same or substantially similar training as is proposed. In subsequent years, the vendors will be expected to increase performance to a minimum of 70% to remain in consideration. (Note: neither the initial nor subsequent performance levels necessarily reflect final performance standards which will need to be determined by the Board. Rather, these numbers are used to establish a threshold of achievement for consideration and for approval. )</p>	<p>WIA requires that most of the funds available for skills training services be distributed through Individual Training Accounts (ITA). This method can only be utilized by vendors that are certified by the Local Workforce Investment Board. The principles governing a vendor selection process should focus on including a broad range of potential training opportunities, at reasonable costs, and for varying lengths of time, in occupations that are in demand by employers in the area. The purpose that these principles address is to make available to customers the most effective range of training possible given the fact that financial resources are severely constrained.</p> <p>The principles will govern the operation of the Individual Training Account vendor selection process in the initial two-year period as required by the law. A period of subsequent eligibility will</p>

	<p>2.) Those vendors must demonstrate a history of, or commitment to, training and placing into employment low income persons.</p> <p>3.) Those vendors new to Boston, or which are beginning programs not previously offered, must demonstrate the capacity and commitment to meet the administrative requirements of the Boston system, including performance standards. The performance of all vendors will be evaluated at least annually, to determine their continuing eligibility to remain on the list and financial stability.</p> <p>4.) That vendors must demonstrate substantial employer involvement in the design and operation of the training program, either by means of providing references of employers which have worked with the vendor and hired graduates, or by identifying an employer advisory committee which advises the vendor on the content, substance, and operation of the program.</p> <p>That, while no “cap” is established for the cost of the ITAs, the average of all ITAs in the system is expected to be approximately \$5,000 per individual enrolled.</p> <p>The concept of continuous quality improvement is to be addressed by all potential vendors</p>	<p>be implemented after the initial period, and will focus more substantially on performance within the initial period.</p> <p>Section 122 of the Act and 20 CFR Part 663, Subpart E-Eligible Training Provider is the statutory and regulatory references, respectively, regarding the selection of eligible training providers. Section 134 (d) (4)(G) of the Act and 20 CFR Part 663, Subpart D of the regulations provide guidance on the use of Individual Training Accounts.</p>
4/6/00	<p><b>Priorities for intensive and training services:</b> The Boston Workforce Development system has traditionally provided services to the residents of the City who are most in need of assistance in order to become economically self sufficient. In that the funding available for the implementation of the Workforce Investment Act is severely limited, residents of the City most in need of assistance under the Act are to be prioritized for intensive and training services in the Career Centers.</p> <p>The following characteristics should be used by the Career Centers to identify the dislocated workers to receive intensive and training services:</p> <p>An English reading and computing achievement at less than a 9<sup>th</sup> grade level. (Since the best predictor of labor market success in the Boston market is educational achievement, persons who have advanced educational levels such a college degrees will not meet this priority, unless there are unusual and compelling</p>	<p>[Please note that this policy statement includes the principle of self-declaration.]</p> <p>WIA allows the Board to establish priorities for service for low income persons and welfare recipients if funds are limited. In a previous decision (see above), the Board determined that WIA funds for low income individuals are limited and that a priority for service within the context of the Act should be established. The staff was directed to research and recommend a suitable policy that will insure scarce resources are targeted to those most in need of assistance.</p> <p>An analysis of the data yielded by Boston’s ITA demonstration project conducted in FY’00 led to the development of the recommended policy for prioritizing the use of ITA funds.</p> <p>Section 134(d)(4)(E) of the Act, and sections 20 CFR Parts 663.600(b), 663.600(c) and 663.600(d) of the regulations are the statutory and regulatory references.</p>

	<p>circumstances.)</p> <p>Employed, but earning less than 175% of the Lower Living Standard Income Level for the Boston metropolitan area. (capped up to 20% of available training funds should be used to assist persons in this category to achieve self sufficiency.)</p> <p>Lack of a good work history, with extensive periods of unemployment or underemployment, or of non-participation in the labor market.</p> <p>A history of involvement with the courts that affects employability.</p> <p>Dislocated workers living or previously working in Boston whose education achievement, or English language ability may affect re-employment. Unusual and compelling circumstances for dislocated workers may include higher education that is outdated, is inclusive of non-English language degrees, or is in a field that has been rendered obsolete by technological or economic change in the labor market.</p> <p>Other identifiable barriers to employment including a disability.</p> <p>Customers are required to submit proof of eligibility or of priority status.</p>	
4/6/00	<p><b>Training funds of the last resort:</b> The Boston Workforce Development system is organized to provide simple and direct access to necessary services for both job seekers and employers. As an integral part of the system, the operation of the Individual Training Accounts (ITA) should also be as straightforward as possible. The purpose of this statement is to clarify the funding process that should be used to assist customers in achieving their training goals.</p> <p>A customer who is eligible for training may be given an ITA using WIA funds, if such funds are available, under the following circumstances:</p> <ol style="list-style-type: none"> <li>1.) The vendor which the customer has chosen in consultation with a Career Center Counselor is not approved to receive Pell grants or other forms of State or Federal student financial assistance.</li> <li>2.) The Customer has applied for other forms of assistance as may be appropriate, and <ol style="list-style-type: none"> <li>a) has been determined ineligible, or</li> </ol> </li> </ol>	<p>The Workforce Investment Act (WIA) envisions a training system that relies on a variety of sources to support training activities, and which uses the WIA allocation only if the customer is unable to obtain other grant assistance including Pell, or if the customer requires assistance in addition to what other grants provide.</p> <p>A policy statement regarding this aspect of the law is needed to insure that our system has guidance in implementing this new provision.</p> <p>See section 134 (d)(4)(B) of the Act and sections 20 CFR Parts 663.310 and 663.320 of the Regulations for additional guidance.</p>

	<p>b) has been approved for an insufficient amount, (WIA funds may be used for the balance remaining after other funds are applied) or</p> <p>c) A determination is pending. (reimbursement to WIA funds must be made if the customer is subsequently eligible for a Pell grant)</p> <p>5.) The Customer is not eligible to have training in the appropriate occupation areas paid for through the Employment Services Program (ESP) of the Department of Transitional Assistance or other such funding source.</p> <p>The Customer is eligible for support through ESP, or other such funding source, but the amount of the support is insufficient to pay for the full cost of the training, in which case WIA funds may be used for the balance remaining after other funds have been applied.</p>	
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## ATTACHMENT 2

MENU OF OPTIONS FOR VERIFYING INFORMATION COLLECTED ON CUSTOMER  
PORTFOLIO SUMMARY AND IN MOSES

Element	Information gathering/Verification Options
Address	Self declaration
Income	Pay stubs or IRS 1040 Form
Citizenship/Right to Work	Document with Passport or Green Card with Alien Registration number
Selective Service registration (if applicable)	Website (see “Instructions for Completing CPS”)
Educational	<ul style="list-style-type: none"> <li>• Standardized test</li> <li>• Completion of grade level rated document</li> </ul>
Dislocated Worker Status	<ul style="list-style-type: none"> <li>• Letter from employer</li> <li>• UI receipt</li> </ul>
Work History	<ul style="list-style-type: none"> <li>• Interview</li> </ul>
Skills	<ul style="list-style-type: none"> <li>• Interview</li> <li>• Test</li> </ul>
Interests	<ul style="list-style-type: none"> <li>• Inventory</li> <li>• Interview</li> </ul>
Alignment of skills/interests/qualifications with jobs	<ul style="list-style-type: none"> <li>• Labor market research</li> <li>• Informational interviews</li> </ul>
Unique challenges/barriers/characteristics	<ul style="list-style-type: none"> <li>• Interview</li> </ul>

## **ATTACHMENT 3**

### **STUDENT PERFORMANCE LEVEL (SPL)**

#### **SUMMARY CHART**

STUDENT PERFORMANCE LEVELS — ABBREVIATED VERSION

<b>0</b>	No ability whatsoever.		
<b>I</b>	<ul style="list-style-type: none"> <li>Functions minimally if at all, in English.</li> </ul>	<ul style="list-style-type: none"> <li>Can handle only very routine entry-level jobs that do not require oral communication, and in which all tasks can be easily demonstrated.</li> </ul>	<ul style="list-style-type: none"> <li>A native English speaker used to dealing with limited English speakers can rarely communicate with a person at this level except through gestures.</li> </ul>
<b>II</b>	<ul style="list-style-type: none"> <li>Functions in a very limited way in situations related to immediate needs</li> </ul>	<ul style="list-style-type: none"> <li>Can handle only routine entry-level jobs that do not require oral communication, and in which all tasks can be easily demonstrated.</li> </ul>	<ul style="list-style-type: none"> <li>A native English speaker used to dealing with limited English speakers will have great difficulty communicating with a person at this level.</li> </ul>
<b>III</b>	<ul style="list-style-type: none"> <li>Functions with some difficulty in situations related to immediate needs</li> </ul>	<ul style="list-style-type: none"> <li>Can handle routine entry-level jobs that involve only the most basic oral communication, and in which all tasks can be demonstrated.</li> </ul>	<ul style="list-style-type: none"> <li>A native English speaker used to dealing with limited English speakers will have great difficulty communicating with a person at this level.</li> </ul>
<b>IV</b>	<ul style="list-style-type: none"> <li>Can satisfy basic survival needs and a few very routine social demands.</li> </ul>	<ul style="list-style-type: none"> <li>Can handle entry-level jobs that involve some simple oral communication, but in which tasks can also be demonstrated.</li> </ul>	<ul style="list-style-type: none"> <li>A native English speaker used to dealing with limited English speakers will have difficulty communicating with a person at this level.</li> </ul>
<b>V</b>	<ul style="list-style-type: none"> <li>Can satisfy basic survival needs and some limited social demands.</li> </ul>	<ul style="list-style-type: none"> <li>Can handle jobs and job training that involve following simple oral and very basic written instructions but in which most tasks can also be demonstrated.</li> </ul>	<ul style="list-style-type: none"> <li>A native English speaker used to dealing with limited English speakers will have some difficulty communicating with a person at this level.</li> </ul>



<b>VI</b>	<ul style="list-style-type: none"> <li>• Can satisfy most survival needs and limited social demands.</li> </ul>	<ul style="list-style-type: none"> <li>• Can handle jobs and job training that involve following simple oral and written instructions and diagrams.</li> </ul>	<ul style="list-style-type: none"> <li>• A native English speaker not used to dealing with limited English speakers will be able to communicate with a person at this level on familiar topics, but with difficulty and some effort.</li> </ul>
<b>VII</b>	<ul style="list-style-type: none"> <li>• Can satisfy survival needs and routine work and social demands.</li> </ul>	<ul style="list-style-type: none"> <li>• Can handle work that involves following oral and simple written instructions in familiar and some unfamiliar situations.</li> </ul>	<ul style="list-style-type: none"> <li>• A native English speaker not used to dealing with limited English speakers can generally communicate with a person at this level on familiar topics.</li> </ul>
<b>VIII</b>	<ul style="list-style-type: none"> <li>• Can participate effectively in social and familiar work situations.</li> </ul>		<ul style="list-style-type: none"> <li>• A native English speaker not used to dealing with limited English speakers can communicate with a person at this level on almost all topics.</li> </ul>
<b>IX</b>	<ul style="list-style-type: none"> <li>• Can participate fluently and accurately in practical, social, and work situations.</li> </ul>		<ul style="list-style-type: none"> <li>• A native English speaker not used to dealing with limited English speakers can communicate easily with a person at this level.</li> </ul>
<b>X</b>	<ul style="list-style-type: none"> <li>• Ability equal to that of a native speaker of the same socioeconomic level.</li> </ul>		

**EDIC/BOSTON**

**OFFICE OF JOBS AND COMMUNITY SERVICES**

**PROGRAM MONITORING**

**GUIDE**

# **PROGRAM MONITORING GUIDE**

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## **MONITORING GUIDE**

### **JOBS AND COMMUNITY SERVICES/PROGRAM MANAGEMENT DIVISION**

#### **1.0 INTRODUCTION**

The Program Management Division of the Jobs and Community Services Department of the Economic Development Industrial Corporation (EDIC) of Boston is responsible for the monitoring of all agency-sponsored employment and training contracts. The goals of this monitoring are to: guarantee the quality of funded employment and training services to Boston residents; ensure that adequate administrative systems are in place and that funds are spent properly; identify programs in need of technical assistance; and verify contractors' compliance with federal and state regulations, EDIC policies and procedures and terms and conditions of the contract.

EDIC's monitoring effort involves four distinct activities: monthly performance review of each contract or grant, as appropriate; monthly management review of all contracts and grants; annual site visits; and provision of technical assistance and/or invocation of corrective action. The following describes the operational standards of EDIC's monitoring system.

#### **2.0 MONTHLY PERFORMANCE REVIEW**

The Adult Services and Youth/Special Projects units of EDIC/JCS' Program Management Division are responsible for monitoring all workforce development contracts, including but not limited to:

- Workforce Investment Act (WIA)
- Welfare To Work (WtW)
- DTA's Employment Services Program (ESP)
- DOL funded Discretionary/Demonstration Grants
- National Emergency Grants (NEG)
- Neighborhood Jobs Trust (NJT)
- Youth Opportunity Grant (YOG)
- Alternative Education Initiative (AEI)

Program Managers, Program Coordinators, and Contract Administrators meet monthly to conduct a performance review for each contract (on occasion a two-month period is reviewed). The purpose of the performance review is to analyze the program performance and administrative responsiveness of each contract for the previous month(s).

In preparation, staff review all relevant documents which vary depending on grant/funding source: monthly narrative reports; monthly management reports from EDIC's Computer Services which summarize quantitative data on vendor performance and provide demographics; planned enrollment and outcome data; all correspondence for the month between EDIC and the contractor; invoice reports generated by EDIC's Administrative and Finance Department; and site visit reports.

Based on the information from these sources and the staff's interaction with the vendor, a monthly performance review is completed for each contract. In a formal meeting with the Program Manager, the Coordinator or Contract Administrator then presents the report with the backup documentation.

Program Managers report to their respective supervisors informally in regular supervisory meetings and more formally to EDIC's executive staff through any of the following meetings depending on timing and scheduling:

Contract Management Task Force  
Senior Staff Meetings  
Executive Staff Meetings

Key elements of the organization are represented within one or more of these forums and include fiscal, contracts, MIS, planning and program management staff. A typical format would include a performance summary by the Program Manager highlighting strengths, weaknesses and problem areas by program and by grant. When performance issues arise, a discussion ensues which forms the basis of a plan of action. The plan is followed up by the Program Manager and the appropriate staff person with the requirement that progress reports be provided to the group.

### **3.0 DATA ANALYSIS FOR PROTECTED GROUPS**

By grant/title level and activity level, EDIC analyzes participation and evaluates the effectiveness of programs and services in meeting the needs of protected groups. Data analysis is conducted at least once per year, though EDIC strives to complete quarterly reviews. The analysis occurs in conjunction with program monitoring and with the goal of identifying any deficiencies or patterns of discrimination. Data analysis for protected groups is also part of an annual performance review conducted by Boston's Workforce Advisory Group (WAG). This group, sponsored and staffed by EDIC and the Boston PIC, is composed of community based organizations representing youth services, adult literacy, and job training as well as representatives of the Commonwealth Corporation and the

Department of Transitional Assistance. The WAG reviews WIA performance and demographics on a quarterly basis. This in-depth review becomes an important part of Boston's planning process.

#### **4.0 SITE VISITS FOR CONTRACT OVERSIGHT**

EDIC monitors all group contracts at least once and ideally twice per year. Program Coordinators and Contract Administrators serve as the primary monitors though Program Managers and other EDIC staff visit sites on a selective basis as part of a team approach. Site visits are timed to maximize the effectiveness of monitoring for quality and compliance. The first visit is usually more comprehensive with a focus on administrative systems, compliance and quality. Subsequent visits typically focus on quality and/or involve special events such as a graduation.

- **Quality Review**

EDIC reviews the quality of services for each contract. Quality is evaluated through classroom observations, staff interviews, participant interviews, and participation in other activities such as graduations, advisory board meetings, etc.

At a minimum, the following elements will be reviewed:

- applicant enrollment/intake orientation
- participant counseling/case management
- participant assessment and goal setting (individual service strategy)
- education/training instruction
- job development/placement activity
- support services
- follow-up services/activities

#### **5.0 SITE VISITS FOR INDIVIDUAL TRAINING ACCOUNTS (ITA'S)**

Individual Training Accounts (ITA's) for the adult system will be monitored throughout the fiscal year. Since ITA's are released in July, November and March, these time periods will be incorporated as part of the formula for selecting and establishing monitoring priorities. In addition, we will monitor from two perspectives:

- the customer (random sampling)
- the vendor (based on risk factors)

ITA's will be monitored based on a random sample of twenty-five percent (25%) for Title IA (economically disadvantaged) and Title ID (dislocated worker)

customers. As an overlay to the sampling methodology, staff will also consider other risk factors in developing a comprehensive monitoring plan, including:

- New vendors/new programs
- Programs with more than 10 ITA's
- Those vendors/programs about which we have received negative feedback from customers, career center staff, etc.

Customer interviews and on-site observation are critical monitoring elements. To the extent possible, monitors will strive to interview vendor staff as a means of verifying relevant information and as part of the compliance and quality review. In particular, monitors will document the provision of support services and job placement assistance for those programs that market these components as part of their WIA training design. Experience has shown that there often is a discernable difference in levels of participation in the monitoring process between community-based organizations and proprietary institutions usually depending on size and structure.

Plans are set for the first time to augment the FY'03 youth system by adding twenty (20) ITA's as part of WIA. It is expected that there will be a limited number of training vendors. EDIC's Youth department plans to monitor all of the ITA training sites.

## **6.0 PROVISION OF TECHNICAL ASSISTANCE**

EDIC is committed to providing technical assistance to vendors. The vast majority of assistance we provide is handled individually with vendors and is usually in response to a request communicated in a monthly narrative report or through site visits. Technical Assistance is also initiated by monitoring staff as a follow up to findings.

EDIC in partnership with the Boston PIC sponsors a wide range of program operator meetings for vendors as a regular "best practice". The regularity of meetings depends on the grant and the needs of the group. Under WtW, meetings for case managers occur on a monthly basis. A "Welfare Stakeholders" meeting is held quarterly for vendors, DTA staff and specialists from child care, transportation, etc. EDIC meets monthly with Boston's three career centers to provide on-going staff training and to review and problem solve on WIA and other grant issues. EDIC and the Boston PIC formed a "Best Practices" workgroup shortly after the start of WIA to address implementation issues. The workgroup is composed of training vendors and career center staff. WIA training vendors will meet in the future at least once annually. Each of these meetings typically provides information sharing, networking, training and staff development opportunities for those in attendance.

## 7.0

### CORRECTIVE ACTION

Corrective Action is the process that occurs prior to contract suspension and/or termination and the de-obligation of funds, and after all other technical assistance efforts have been taken and are proven to be ineffective to resolve the problem(s). The Corrective Action process outlined below applies more to group contracts and less to an ITA system. Poor performance in an ITA system is addressed through the “report card” process initiated by the state. Therefore, it is more likely that corrective action in an ITA system would result from monitoring findings with the training vendor.

EDIC Program Management will initiate corrective action in the following situations:

- (1) when a regulatory violation has occurred;
- (2) when participants’ health or safety is threatened;
- (3) when primary contracted services have not been delivered;
- (4) when funds have been improperly expended; or
- (5) in the event that performance is significantly below plan

The first step EDIC takes when a problem is identified is to offer technical assistance particularly when dealing with the “gray area” of the non-delivery of services. Program Managers and staff will propose a course of action and a timeline for completing it. If there is a failure to meet contractual goals or performance standards, a judgment call must be made. For example, if a training program falls 15% below planned enrollment levels, a determination must be made as to whether the problem is specific to that program’s operations, or if the numbers reflect a system wide problem that requires a citywide or statewide technical assistance strategy. A decision will then be made about whether the corrective action plan is appropriate or that performance goals need to be revised. In the event that corrective action is deemed necessary, the overall process is as follows:

- Step 1:** Confirmation of the situation requiring corrective action. The Program Coordinator or Contract Administrator confers with the Program Manager.
- Step 2:** The Program Manager notifies the appropriate Deputy Director to clear issuance of corrective action.



- Step 3:** A formal written corrective action letter is issued to the vendor, to include:
- description of the problem;
  - how problem was identified;
  - effect problem has on program/client service;
  - vendor will be asked to develop a corrective action plan which documents measures to be taken and time frame to correct the problem(s)
- Step 4:** Program Management Division staff will review the corrective action plan from the vendor and either approve or disapprove. If the plan is disapproved, Program Management will meet with the vendor to discuss areas in the corrective action plan requiring further explanation/modification in order to make the plan approval. Failure on the part of the vendor to submit a corrective action plan may result in contract termination or suspension and/or de-obligation of funds or the suspension of any new approved ITA's.
- Step 5:** EDIC will monitor the approved corrective action taken as outlined in the plan and ensure the problem(s) has been resolved.
- Step 6:** Failure to reach resolution may result in the initiation of a contract suspension or termination process and/or the de-obligation of funds. In the case of WIA ITA's, failure to reach resolution will likely result in the suspension of ITA approvals.
- Step 7:** In the event the determination has been made to initiate contract suspension or termination and/or the de-obligation of funds, or the suspension of ITA referrals, EDIC will send the vendor a letter (Certified Return Receipt Requested) informing them of the decision.



## **Boston Follow Up Services Policy**

The purpose of follow up services is to enhance wage retention, wage gain, and career progress for customers who have entered unsubsidized employment. Boston will offer follow up services to those customers who are interested in on-going support. The frequency and intensity of services may vary depending on the needs and interests of each individual. Customers who have multiple employment barriers and limited work histories may be in need of significant follow up services to achieve long term success in the labor market. A special effort will be made to inform these customers of services available to them once they secure employment. Although follow up services are available to all customers up to a 12 month period, not all customers may choose to take advantage of these services.

Follow up services may include, but are not limited to:

- Additional career planning and counseling
- Employer contact and assistance with work related issues
- Peer Group Supports
- Information about education and training opportunities
- Referral to support services

## **DIVISION OF EMPLOYMENT AND TRAINING (DET) PRINCIPLES FOR NATIONAL EMERGENCY GRANTS (NEGS)**

### **Executive Summary**

#### **Background**

National Emergency Grants (NEGs) are Title I discretionary funds for dislocated workers awarded by USDOL to address significant layoffs for populations in need and where formula or other funds are not available to provide quality services to those individuals. As funds (especially for training) are limited and have been reduced annually, workers coming to the One Stop Career Centers in large numbers relating to company layoffs generally exceed the capacity (funds, staff, space) of the centers to provide the services needed to re-employ these customers. Often, a particular local area experiences several mass layoff situations, further draining the capacity at those career centers. Therefore, the National Emergency Grant (NEG) Committee of the Division of Employment and Training (DET) works to identify the need for a National Emergency Grant based upon the timing and size of the layoff, the demographics and skill levels of the population, availability of funds, etc. Grants are most often written for populations in need of a high level of intensive and training services.

With the implementation of WIA, local areas have attempted to mirror services for the NEG grant customers to the services provided at the Career Centers. As noted, the Career Center services, especially training funds, are not always adequate to meet the specific needs of the workers who would be targeted for an NEG. The United States Department of Labor (USDOL) has yet to issue NEG Regulations under WIA to guide the state and local areas in the development, implementation and oversight of NEGs.

USDOL's expectation for NEGs articulated in the draft NEG regulations is that, although NEG "projects should be generally designed to operate in conjunction with the policies and structures of the local One-Stop System, NEG projects are intended to be focused, quality-based responses to significant dislocation events and, therefore, NEG funds should be used to supplement and enhance the ability of local systems to achieve high quality employment and earnings outcomes for the workers affected by these events." Therefore, USDOL allows for variance from the local area policies to encourage specialized services to be provided and the approval of funds to provide the intensity of services required for the targeted population. USDOL also expects that NEG operators will conduct intensive outreach campaigns to ensure that all impacted workers are aware of and are able to receive services.

Funds are being assigned to assist workers from a particular company or companies therefore USDOL expects that these workers will receive: highly accessible services through a streamlined service process; timely registration; individualized guidance to empower the worker to establish appropriate reemployment and earnings goals and select appropriate training programs and providers; and opportunity for high quality employment and earnings outcomes.

Currently, the level of understanding among local area operators of NEGs ranges from general understanding of USDOL expectations and principles to belief that these funds merely supplement formula funds and in that regard, laid off workers should receive the same services through an NEG as other dislocated workers registered or enrolled at the Career Center. This often means that NEG customers are on wait lists for orientation and counseling sessions, that they are guided toward self-directed services versus individualized intensive services even when they need assistance, and are subject to a low training cap. Such factors render it difficult for the customers and the program to meet USDOL's high performance standard expectations for NEGs.

Therefore, the NEG Principles are intended to provide a guide for local areas regarding the levels, timing and kinds of services which should be provided to NEG customers and to support consistency in operation of NEGs across the state. Based upon this need, representatives from Commonwealth Corporation's Operations and Field Services, Rapid Response and Monitoring have identified and agreed upon a number of Issues which require DET support and are found in the attachment to this Executive Summary.

The information provided herein has been prepared based upon the former National Reserve Account (NRA) Regulations, the draft NEG Regulations, feedback from the NEG National Workgroup and past history with successful NRA projects. This information has been communicated in a number of ways including an NEG training session held in June 2002 for all NEG operators, through meetings with the LWIBs and Administrative Entities in whose area the need for an NEG grant has been identified and through ongoing technical assistance provided to the NEG projects during start-up and operation.

## **DET PRINCIPLES FOR NEGS**

*NEG Projects provide value-added, accelerated, timely, specialized, individualized services to grant customers. To accomplish this, the NEG project must provide appropriate location, staff and resources and be recognizable to the customer. NEG funds are discretionary funds provided for the purpose of providing a higher intensity of services to specific populations than would be available through Formula Funds.*

### **Mindset of Inclusion vs. Exclusion (Paradigm Shift)**

NEG Operators must start with the assumption that they can serve every NEG customer through the grant and then individually determine which services the person is eligible for (screening in rather than out). The fact that an NEG was submitted and approved assumes a certain level of need.

- Customers should be enrolled as soon as possible following the delivery of one intensive service. Projects should not wait to enroll individuals until they are entering training.
- Factors such as education level, past job, etc. does not automatically exclude a customer from training or other services.

### **Operator Selection**

The WIA Title I Fiscal Agent will be designated as the Operator of the National Emergency Grant.

### **Center Location**

The timing (all at once or staggered) and size of the layoff, target group and career center capacity should all figure into the appropriate center location and be negotiated on a case by case basis between DET and the local area. The location should have a separate, distinct identity and be readily available to customers.

- Dedicated space where dedicated staff can be located to provide customer with immediate assistance.
- A sign or banner to let people know that services are there and targeted for them.
- Adequate space to provide the necessary specialized and intensive services (resource room access, computers, workshop space, etc). *Customers should not be part of the normal waitlist at the Career Center).*
- Convenient to most workers' residences and the travel access needs of specific populations.
- Donated space by the employer should be considered.

### **Staffing**

Staffing for the grant must include dedicated, assigned staff to the grant adequate to deliver the planned grant services at the level outlined above. Staff assigned to the grant must work proactively rather than reactively. Peer counselors from the affected workforce are highly recommended when possible and appropriate.

- Appropriate % of f.t.e. must provide project oversight in accordance with the size of the project.
- Must include a full time dedicated Project Manager.
- Number of Counselors/Case Managers should equal 1 FTE for every 50-80 customers depending upon the needs and/or demographics of the population.
- Outreach staff is essential especially in the early phase of the grant.
- Staffing should be phased in and out based upon the layoff and enrollment pattern for the grant.

## **Case Management**

Case Management is a process and functional area, in which a staff person (or team) helps design and coordinate a program of services with a customer. It is based on a partnership between staff and a customer. Customer and staff have distinct responsibilities toward the re-engagement of the customer with satisfactory employment and linking to the Career Center system components for support and as an ongoing resource.

An underlying principle of NEG's is that customers will receive intensive and on-going case management and coaching at approximate thirty day intervals while enrolled in the NEG and especially at key junctures such as Objective Assessment, training research, enrollment into retraining, training completion, job development, job search, etc. During training, it is essential that this contact is maintained to support attainment of customers' objectives and NEG objectives.

Coaching is defined as providing assistance to an individual to solve a problem to do something better and/or eliminate a barrier affecting the attainment of customer goals through direct discussion and guided activity.

All interactions and activities are intended to help a customer continue to move forward to achieve identified goals and ultimately satisfying employment.

- NEG Projects must utilize the MOSES Case Plan (Case Management Tool) for the customer's individual plan.
- Case Management must be reflected in comprehensive customer case notes.
- Case notes and all services must be recorded in MOSES.

## **Training Caps**

If a Project Operator has reasons for imposing a cap this must be negotiated with DET.

- Operator must not utilize a minimalist cap such as the one used in the Title I Formula Dislocated Worker Program.
- Variable caps should not be imposed based upon educational levels: same cap for all.
- Sound counseling/case management practices as well as fiscal oversight and control are the basis for approving a particular training regardless of cost.
- A training decision should be based upon the individual's Career Development Plan including the individual's current lack of marketability, the local labor market need and marketability of the new career.

## **Customer Satisfaction Surveys**

- NRA grants required completion of Customer Satisfaction Surveys with a performance of 70% very satisfied with services on a five-point scale.
- There are no specific guidelines regarding customer satisfaction surveys for NEG's since there are no regulations, as yet but the assumption is that since there are requirements under WIA, that the information would be captured in the same manner.
- Until USDOL mandates otherwise, NEG Operators should utilize the Customer Satisfaction Process and Forms in MOSES (which were used for NRA grants). Upon award of an NEG, DET will forward the forms and instructions.

**Multiple Operator Grants**

- Operators will participate in regularly scheduled project coordination meetings as required to determine and coordinate consistent practices and grant performances.
- Operators will all operate according to the NEG mission regarding services and strive for consistency of services (policies, support services, Needs Related Payments, ITAs, training caps, etc.).
- If a cap is authorized, the cap must be consistent among operators.
- Operators will work with DET to reallocate grant funds among project operators based upon identified need that varies from the original project budget and enrollment projections.

**Vouchering Component**

- Any NEG operator who is administering a vouchering component must utilize the Airlines Project model (which was reviewed and approved by local areas statewide).
- The local area operating the vouchering component is held harmless regarding performance for the vouchering component enrollments.
- The career center providing services to the customer is responsible for determining eligibility for the NEG.